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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

FRASERSIDE IP LLC,

Plaintiff,

Case: 3:12-cv-699

v.

COMPLAINT AND JURY DEMAND
COPYRIGHT INFRINGEMENT
TRADEMAR INFRINGEMENT

William Michael Jones aka Michael Jones aka
Mike Jones aka Mike Bone aka BoneProne,
Mindy Jones aka Mindy Jacobs aka Queen
BoneProne aka “Porn Mafia Family”, dba
boneprone.com, dba tubekings.com and dba
socialmovies.com, www.boneprone.com,
www.tubekings.com, and
www.socialmovies.com, and La Vista, a
Philippines entity, and Chin Holdings China, a
Panama entity, Marvin Greencarrier, and John
Does 1 - 100 and John Doe Companies 1 – 100

Defendants.

Plaintiff Fraserside IP LLC, an Iowa Limited Liability Company (hereinafter referred to as
“Plaintiff” or “Fraserside” or “FIP”) by and through its counsel, for its complaint against
Defendants William Michael Jones aka Michael Jones aka Mike Jones aka Mike Bone aka

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BoneProne, Mindy Jones aka Mindy Jacobs aka Queen BoneProne, aka “Porn Mafia Family” dba boneprone.com, dba tubekings.com and dba socialmovies.com and www.boneprone.com and www.tubekings.com and www.socialmovies.com, La Vista, a Philippines entity, and Chin Holdings China, a Panama entity, and Marvin Greencarrier (collectively hereinafter referred to as “Defendant” or “Defendants” or “BoneProne”) based upon federal question and supplementary jurisdiction, for just cause presents the Court with the following Complaint and requests for relief.

INTRODUCTION

Piracy of copyrighted and trademarked works is a multi-billion dollar, global industry of theft. The piracy of legal adult entertainment is the training ground for all other forms of online piracy – audio books, television shows, digital music files, and general release Hollywood movies. USA Today wrote, “Online porn often leads high-tech way” http://www.usatoday.com/money/industries/technology/2004-03-09-onlineporn_x.htm and it is a fact that pornography lead the technological advances and mass acceptance of VHS, DVD’s, the growth of the Internet, streaming video, online advertising, online payment processing, and downloads. Online piracy of pornography has lead the way for piracy of more mainstream copyrighted works; it has provided a roadmap at a significant cost to the legitimate and legal adult and mainstream entertainment industries. The pirates of pornography train like professional sports players before a big game; they are masterful at their craft and execute with precision. They diligently find ways to hide assets and identities while exploiting weaknesses in their prey. Piracy such as that committed by Defendants is committed only for profit; no party engages in piracy out of any feeling of philanthropic responsibility or to further constitutional free expression. The Rand Institute’s 2009 publication Film, Piracy, Organized Crime, and Terrorism determined that “Piracy is high in payoff – with profit margins greater than those of illegal narcotics – and low in risk often taking place under the radar of law enforcement. In addition, terrorist groups have in some cases used the proceeds of film piracy to finance their

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activities. Besides being a threat to the global information economy, counterfeiting threatens public safety and national security.”

http://www.rand.org/pubs/monographs/2009/RAND_MG742.pdf

In May 2011, Assistant Attorney General Lanny A. Breuer of the Criminal Division during a speech to the International Anti-Counterfeiting Coalition Spring Conference said, "[Intellectual Property] IP Crime is a serious threat. It jeopardizes the health and safety of consumers. It stifles creativity. And it has a negative effect on the American economy.

Source: FBI Counterintelligence Strategic Partnership Newsletter <http://www.ndiastl.org/wp-content/uploads/2011/07/Newsletter-July.pdf> (Page 3)

Piracy of copyrighted works is not a victimless crime and certainly not new to the entertainment field. Music, movies, videos and books have been copied and distributed without authorization or compensation to the rightful owner for as long as creative people have memorialized their ideas on paper. In the past, copies were easier to spot and distribution of unauthorized works more difficult. With the advent of the Internet reaching around the globe and the ability to replicate digital files infinitum, the ease of pirating copyrighted material has contributed to the explosion of unauthorized material. The global reach of the Internet allows website operators to hide behind borders, fictional names or outdated addresses, thwarting attempts to seek compensation for the unauthorized use of copyrighted content. Traditional geographic borders have no meaning on the Internet, further compounding the difficulty facing legitimate copyright owners attempting to enforce their rights against unauthorized users. Legitimate copyright owners face a steep hill to enforce their rights when their works can be replicated at lightning speed by far away entities, only to be sold back to the legitimate owner's customers in its home market and the pirates claim immunity from prosecution. Plaintiff is turning to this Court to seek redress and justice.

JURISDICTION AND VENUE

1. Plaintiff is a Limited Liability Company organized under the laws of the State of Iowa with its principal place of business in Northwood, Iowa.
 2. Upon information and belief, Defendant Boneprone.com is hiding its real identity behind Direct Privacy ID 524D9, Domain Name Proxy Service Inc., P.O. Box 6592, Metairie, LA 70009, which lists the registered owner of www.Boneprone.com as Marvin Greencarrier, Greencarrier Loos, Ziemelu str. 122 Marupes nov., Lidosta Lidosta, LV1053 Latvia. Upon information and belief, this is a shell covering the true owners. The location of stakeholder William Michael Jones aka Michael Jones aka Mike Jones aka Mike Bone aka BoneProne is believed to be Portland, Oregon. The location of stakeholder Mindy Jones aka Mindy Jacobs aka Queen BoneProne aka “Porn Mafia Family” and further owners and stakeholders will be identified during discovery.
 3. Upon information and belief, Defendant TubeKings.com is hiding its true identity behind La Vista, 6841 Barangay Central, Roman Expressway City, Balanga City, Bataan, 2110, Philippines and Mindy Jacobs, the previous purported registered owner of www.tubekings.com. TubeKings.com also utilizes Chin Holdings China, Calle 33 Ave Roosevelt, Zona Libre De Colon, Colon, Colon 870951 Panama as an alter ego. The location of stakeholders La Vista, Chin Holdings China, and Mindy Jacobs and further owners and stakeholders will be identified during discovery.
 4. Upon information and belief, Defendant SoCalMovies.com is hiding its real identity behind Direct Privacy ID A20B7 Domain Name Proxy Service Inc., PO Box 6592, Metairie, LA 70009, which lists the registered owner of SoCalMovies.com as Marvin Greencarrier, Greencarrier Loos, Ziemelu str. 122 Marupes nov., Lidosta Lidosta, LV1053 Latvia. Upon information and belief, this is a shell covering the true owners. The location of stakeholder William Michael Jones aka Michael Jones aka Mike Jones aka Mike Bone aka BoneProne is believed to be Portland, Oregon. The location of stakeholder Mindy Jones aka Mindy Jacobs aka
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Queen BoneProne aka “Porn Mafia Family” and further owners and stakeholders will be identified during discovery. The location of further owners and stakeholders will be identified during discovery.

5. This Court has subject matter jurisdiction over Plaintiff’s federal claims pursuant to 17 U.S.C. § 101 et seq., Section 32 of the Lanham Act, 15 U.S.C. §1114(1), 15 U.S.C. § 1121, 15 U.S.C. §1125, 28 U.S.C. §1331 and 28 U.S.C. §1338. Venue is appropriate in this District pursuant to 28 U.S.C. § 1391(b)(c).

6. This Court has personal jurisdiction pursuant to 28 U.S.C. §§ 1391 (b) and/or(c)

PARTIES

7. FraserSide IP LLC, an Iowa Limited Liability Company, (Plaintiff or Plaintiffs herein) is the rightful trademark, copyright, and intellectual property owner and/or successor in interest of the United States trademarks, copyrights, and intellectual property that is the basis for this action. The parent company Private Media Group Inc., a Nevada company, is one of the world’s leading producers of high quality brand driven adult motion picture films. Fraserside, commonly and commercially known as “Private”, either directly or as successor in interest, has been producing legal adult entertainment since 1968, from print magazines and movie reels to VHS to DVD to online digital download and streaming. Fraserside’s’ highly sought after intellectual property is distributed on a wide range of platforms including mobile handsets via 104 network operators in 45 countries, digital TV via 38 platforms in 24 countries, broadband Internet, television broadcasting including its own South American cable channel in a venture with world famous Playboy™ and sold on DVD's, on demand and through subscription based web properties. Fraserside has protected its trade names such as PRIVATE, PRIVATE GOLD, PIRATE and THE PRIVATE LIFE OF through United States trademark and service mark registrations and its films through United States copyright registration. Beginning in 1975, Fraserside further protected its intellectual property through registration in more than 25 countries including Australia, Brazil, Canada, Chile, Denmark, Europe, France, Germany, Hong Kong, India, Italy,

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Japan, Mexico, Norway, New Zealand, Panama, Philippines, Poland, South Africa, Spain, Sweden, Switzerland, Taiwan, Thailand, United Kingdom, and Venezuela.

Plaintiff, either directly or as successor in interest, is producer, distributor, and/or exclusive licensor of its motion pictures in the United States. Plaintiff, through parent or sibling entities, is engaged in the business of producing, distributing, and/or licensing to others, the rights to copy, distribute, transmit and exhibit copyrighted motion pictures and/or other audio visual works. Plaintiff expends significant amounts of time, money and other resources to produce high quality products, develop supply chains and distribution systems, and build premium brand recognition of their products.

Plaintiff, either directly or through affiliates or licensees, distribute copyrighted works in various forms, without limitation, over the Internet, on subscription based websites, pay-per-view, video on demand, digital video discs (DVD's), and other formats, by selling them directly or indirectly to the home viewing market or licensing others to do so. Plaintiff also distributes its copyrighted works, without limitation, through Internet streaming and download services.

Plaintiff has registered with the United States Copyright Office the copyrighted works identified in the paragraphs below. Plaintiff has taken industry standard steps to identify its products, including placing recorded warnings at the beginning and end of video productions that appear whenever those videos are played. All copyrights and trademarks claimed by Fraserside IP LLC have been assigned in their entirety to Fraserside IP LLC by the parent or sibling company and transfer documentation has been submitted to the respective government offices.

8. Plaintiff's PRIVATE trademark and service mark have been continuously used in commerce since at least June 1968. U.S. Trademark Registration No. 1014975 was registered on July 1, 1975 and renewed on September 6, 2005.

9. Plaintiff either directly or through affiliates or licensees has expended considerable effort and expense in promoting its trademark and the goods sold under the trademark PRIVATE. As a

result, the purchasing public has come to know, rely upon and recognize the mark PRIVATE as an international brand of high quality entertainment.

10. Plaintiff's PRIVATE GOLD trademark and service mark have been continuously used in commerce since at least August 2004. U.S. Trademark Registration No. 3188677 was registered on December 26, 2006.

11. Plaintiff has expended considerable effort and expense in promoting its trademark and the goods sold under the trademark PRIVATE GOLD. As a result, the purchasing public has come to know, rely upon and recognize the mark PRIVATE GOLD as an international brand of high quality entertainment.

12. Plaintiff's PRIVATE trademark and service mark design of two human female figures have been continuously used in commerce since at least December 2004. U.S. Trademark Registration No. 3389749 was registered on May 26, 2008.

13. Plaintiff has expended considerable effort and expense in promoting its trademark and the goods sold under the trademark service mark design of two human female figures. As a result, the purchasing public has come to know, rely upon and recognize the mark design of two human female figures as identifying Plaintiff's work, an international brand of high quality entertainment.

14. Plaintiff's PIRATE trademark and service mark have been continuously used in commerce since at least May 24, 2000. U.S. Trademark Registration No. 3137445 was registered on September 5, 2006.

15. Plaintiff has expended considerable effort and expense in promoting its trademark and the goods sold under the trademark service mark PIRATE. As a result, the purchasing public has come to know, rely upon and recognize the mark PIRATE as an international brand of high quality entertainment.

16. Plaintiff's THE PRIVATE LIFE OF trademark and service mark have been continuously used in commerce since at least September 1999. U.S. Trademark Registration No. 2875138 was registered on August 17, 2004.

17. Plaintiff has expended considerable effort and expense in promoting its trademark and the goods sold under the trademark THE PRIVATE LIFE OF. As a result, the purchasing public has come to know, rely upon and recognize the mark THE PRIVATE LIFE OF as an international brand of high quality entertainment.

18. Plaintiff, through parent and sibling entities, has produced in excess of 1,000 full-length adults-only or adult-oriented audio-visual works and holds over 100 United States copyrights for its works.

19. Defendant www.Boneprone.com hides its identity behind Direct Privacy ID 524D9, Domain Name Proxy Service Inc. whose address is listed as P.O. Box 6592, Metairie, LA 70009.

20. Defendant Direct Privacy ID 524D9, Domain Name Proxy Service Inc. is a company located at P.O. Box 6592, Metairie, LA 70009.

21. Defendant www.TubeKings.com currently hides its identity behind Domains by Proxy, LLC, 15111 N. Hayden Road, Suite 160, PMB 353, Scottsdale, Arizona 85260. The information provided by the owner to Domains by Proxy is that the registrant contact information is Chin Holdings China, Calle 33 Ave Roosevelt, Zona Libre Do Colon, Colon, Colon 870951 Panama

22. At the time of documentation of infringement, Defendant www.TubeKings.com was registered to La Vista, 6841 Barangay Central, Roman Expressway City, Balanga City, Bataan 2110 Philippines, registered contact Mindy Jacobs aka Mindy Bone.

23. Defendant www.SoCalMovies.com hides its identity behind Direct Privacy ID A20B7, PO Box 6592 Metairie, LA 70009

24. Defendant William Michael Jones aka Michael Jones, aka Mike Jones, aka Mike Bone, aka BoneProne, aka "Porn Mafia Family" claims to be located in Portland, Oregon.

25. Defendant Mindy Jones aka Mindy Jacobs aka “Queen BoneProne” aka “Porn Mafia Family” is in an unknown location.

26. At the time of documentation of the infringements, there was no DMCA Agent listed on Defendant Websites BoneProne.com, SoCalMovies.com, or TubeKings.com

27. There is no DMCA agent listed on the any of Defendant websites BoneProne, SoCalMovies, or TubeKings website at the time of this writing, March 21, 2012.

28. Defendants do business as Boneprone.com and operate the website Boneprone.com [hereinafter BoneProne], Tubekings.com [hereinafter TubeKings] and SoCalMovies.com [hereinafter SoCalMovies]. Relationships among Defendants will be further detailed during discovery.

29. Defendants, through Defendant websites, compete against Plaintiff in the distribution and sale of adults-only audio-visual works through Internet distribution.

30. Upon information and belief, Plaintiff avers that each Defendant, individually, corporately, jointly and/or severally, acted intentionally, knowingly, negligently or through willful blindness, as an agent, or representative of each and every, all and singular, the other Defendants, and acted to further the ends of the illegal and improper purposes alleged herein in a common course or scheme to infringe on the Plaintiff’s copyrighted intellectual property for illegal profit and monetary gain.

STATEMENT OF FACTS

31. Upon information and belief, Boneprone.com is a website that provides adult-oriented audio-visual content to the general public without request for age-verification.

32. Upon information and belief, the Boneprone.com website is visited by over 290,000 internet surfers per day. Upon information and belief, Alexa, a website rating service, ranks Boneprone.com as the 30,229 most visited website in the world. These large numbers of visitors result in Plaintiff’s copyrighted works being viewed tens of thousands of times on Defendant’s website.

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33. According to Alexa, 26.4% of Boneprone.com visitors are in the United States, over thrice the next highest country, Germany, at 7.9%.

34. BoneProne.com's IP Address is listed as being in the United States and hosted by Isprime, Inc. Isprime, Inc. is a website hosting company located at 300 Boulevard East, Suite 100. Weehawken, NJ 07086.

35. Upon information and belief, TubeKings.com is a website that provides adult-oriented audio-visual content to the general public without request for age-verification

36. Upon information and belief, SoCalMovies.com is a website that provides adult-oriented audio-visual content to the general public without request for age verification.

37. Upon information and belief, the websites BoneProne.com and SoCalMovies.com are part of the "Porn Mafia Family" and under common ownership.

38. Upon information and belief, the websites SoCalMovies.com and TubeKings.com are also under common ownership as they have interconnected email addresses, registrations, and common Google Analytics ID numbers.

39. "[T]he Copyright Act grants the copyright holder 'exclusive' rights to use and to authorize the use of his work in five qualified ways," namely, (1) to reproduce the work, (2) to prepare derivative works, (3) to distribute copies of the work to the public, (4) to perform the work publicly, and (5) to display the work publicly. Sony Corp. v. Universal City Studios, Inc., 464 U.S. 417, 432-33, 104 S.Ct. 774, 78 L.Ed.2d 574 (1984); 17 U.S.C. § 106. The Copyright Act provides that "[a]nyone who violates any of the exclusive rights of the copyright owner ... is an infringer of the copyright." 17 U.S.C. § 501. By its definition, each view constitutes a separate and distinct instance of infringement that is produced on a viewer's computer.

Plaintiff's intellectual property has been available for months and for some videos, years, on Defendant's website. With the enormous amount of internet users on Defendant's website, the number of uncompensated views grows daily thus furthering the number of copyright infringements and contributing to the further dilution of the Plaintiff's trade and service marks.

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40. Upon information and belief, Defendant earns significant revenue from selling advertising space on Defendant websites as well as referral fees for “traffic” sent from Defendant websites. According to Defendant, “You know the sign! Throw it up! More traffic than GOD”

41. Upon information and belief, Defendant allows third parties to display Plaintiff's intellectual property to others on third party websites for the purpose of driving traffic back to Boneprone.com. Defendant Boneprone attests to having a network that brings in over 2 Million visitors daily.

42. Upon information and belief, a large portion of videos available on the website appear to be copyrighted videos that, upon information and belief, are not owned by Defendant but are owned by well-known and long-established members of the adult –oriented audio -visual entertainment industry, including Plaintiff.

43. Upon information and belief, Defendant controls which videos are displayed on Defendant website.

44. Plaintiff owns the worldwide rights to its extensive archive of high-quality content and also licenses its trademarks internationally for a select range of luxury consumer products.

45. Plaintiff, as successor in interest, has dedicated significant resources to create, distribute, and protect its works. In addition, Plaintiff dedicates resources to be in compliance with applicable laws in order to protect the integrity of their works and the overall adult entertainment industry.

46. The viability and profitability of Plaintiff is based upon monies and revenue earned from Plaintiff's intellectual property, including copyrights in Plaintiff's films.

47. The Internet, in conjunction with recent significant advances in technology, hardware and software, has resulted in the availability of effective means for circumventing the intellectual property ownership rights in nearly every industry, including adult entertainment. The pervasive and intense online infringement is nearly crippling the adult entertainment industry,

providing unfettered, unregulated, free access to copyrighted works originally produced by reputable businesses and persons.

48. Upon information and belief, these infringers operate without any accountability to governmental requirements or regulations, without any actual investment in the creation of the works, and without any commitment to the vision of the future of the industry. Nonetheless, these infringers utilize, display, and distribute copyrighted works for which they have no right or proper license for their own commercial and significant financial benefit. These actions have caused and continue to cause significant damage to the business and reputation of the true copyright owners.

49. Upon information and belief, Defendant's business model of using unauthorized works without compensation to the works' legitimate owners has significantly contributed to the ability of Defendant to become one of the most visited websites in the world. Defendant offers unauthorized content for free that legitimate competitors must pay for, with extraordinary results. Defendant directs paying customers to competitors with more extraordinary results. An illegitimate business model where the cost of goods sold is zero will be able to drive out legitimate competitors.

50. Upon information and belief, Defendant has created, owns, and/or operates the Internet Web site www.Boneprone.com. In concert with the Doe Defendants, Defendant BoneProne uses this site to display and distribute Plaintiff's films, among others, to Internet Users.

51. Upon information and belief, Defendant has created, owns and/or operates the internet website www.tubekings.com. In concert with the Doe Defendants, Defendants BoneProne uses this site to display and distribute Plaintiff's films, among others, to internet users.

52. Upon information and belief, Defendant has created, owns and/or operates the internet website www.socalmovies.com. In concert with the Doe Defendants, Defendant BoneProne uses this site to display and distribute Plaintiff's films, among others, to internet users.

53. Upon information and belief, Defendant website TubeKings.com is owned and operated by the BoneProne defendants.

54. Upon information and belief, Defendant website TubeKings.com obtains videos, among other methods, by “scraping/spidering of other tube sites”

55. Defendant BoneProne and the Doe Defendants each know, or have reason to know, that there is no proper license or authority to display and distribute Plaintiff’s films on Defendant’s website and no proper license or authority to or obtain commercial financial gain from such display and distribution.

56. Defendants use the websites BoneProne, SoCalMovies and TubeKings to gather a vast and extensive collection of infringed films to display and distribute. The websites are one-stop shops for infringing material. Most, if not a very large portion, of the content indexed on or available on the websites is infringing, unauthorized copyrighted content, including Plaintiff’s copyrighted works.

57. The fundamental purpose of the websites is to capitalize on the illegal dissemination and contribute to the illegal dissemination of infringing works. This display and distribution provides Defendant BoneProne with significant monthly revenues, and deprives Plaintiff of the revenue it is rightfully entitled to receive for viewing of its films.

58. Upon information and belief, the display and distribution of Plaintiff’s films are accompanied by advertisements that generate Defendant BoneProne significant annual revenue. Advertisers purchase ad space on certain pages and in certain locations on Boneprone.com due to the known or estimated Internet traffic that views the particular page or location. The volume of Internet traffic on such page or location is directly attributable to the quality of content displayed and distributed. Thus, the quality of Plaintiff’s films is directly responsible for the revenue generated by the sale of ad space on Defendant’s website.

59. Upon information and belief, blatant copyright infringers, such as Defendants through the website BoneProne, have taken advantage of the existence of legitimate websites that properly

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facilitate the exchange of user-generated content. These infringers attempt to disguise themselves as legally operated websites.

60. Defendant BoneProne provides access to Plaintiff videos, increasing Defendant consumer traffic and driving Defendant's advertising revenues.

61. Defendants' websites are designed for the sole purpose of taking commercial advantage of copyrighted works without any authority whatsoever and to derive benefit from the copyrighted works. This significant commercial and financial advantage is obtained without purchasing or licensing any rights from the copyright holder nor incurring the significant expense of creating and generating the content itself.

62. Upon information and belief, TubeKings did not initially allow users to view high quality versions of Plaintiff's films or download Plaintiff's film to the user's computer, although a significant portion is displayed and distributed. If the Internet user wished to download the video or watch the video in HD, the user clicked on "Full HD 1080" or "Download" or "IPOD/MOBILE" and was taken to a join page where the user is told "You've just earned free instant lifetime access!" On the TubeKings branded page, the first page of the join form states, "Get FREE unlimited lifetime access by simply completing the form below! It only takes a few seconds to sign up and you will NOT be charged. This form is for free membership and verification purposes only! Enjoy your FREE membership!"

63. Upon completion, user is taken to another page that serves as part two of the join process. The user is then required to enter a name and credit card information, and agree to the Terms and Conditions of the purchase. User then is asked to certify they are over 18 years of age and click on "Click for Free Access". When the user completes their "free" membership, they have purchased a 2-day trial to the All Access Network that renews at \$39.95 every 30 days in addition to membership in LifeTimeBonusPass.com for \$39.95 per month and Cyberotica for \$39.95 a month. During the offering of the "Free" membership, the website prints clear language that "FRAUD WILL BE PROSECUTED TO THE FULLEST EXTENT OF THE

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LAW” and “Your IP Address xx.xxx.xx.xx is recorded for fraud prevention”. All allow the Defendant to benefit commercially from Plaintiff’s work without any benefit to Plaintiff.

64. Upon information and belief, the Internet user, initially lead to believe that Defendant’s website is a completely free viewing site, is presented with options that appear to enhance the viewing experience of unauthorized works owned by Plaintiff. The user is lead to believe he can download the films only through registration, which directly and financially benefits the Defendant. Defendants give away unauthorized viewing of Plaintiff’s property enticing users to purchase products with direct financial results to Defendant.

65. Upon information and belief, SoCalMovies did not initially allow users to view high quality versions of Plaintiff’s films or download Plaintiff’s film to the user’s computer, although a significant portion is displayed and distributed. If the Internet user wished to download the video or watch the video in HD, the user clicked on “Full HD 1080” or “Download” or “IPOD/MOBILE” and was taken to a join page where the user is told “You’ve just earned free instant lifetime access!” On the TubeKings branded page, the first page of the join form states, “Get FREE unlimited lifetime access by simply completing the form below! It only takes a few seconds to sign up and you will NOT be charged. This form is for free membership and verification purposes only! Enjoy your FREE membership!”

66. Upon completion, user is taken to another page that serves as part two of the join process. The user is then required to enter a name and credit card information, and agree to the Terms and Conditions of the purchase. User then is asked to certify they are over 18 years of age and click on “Click for Free Access”. When the user completes their “free” membership, they have purchased a 2-day trial to the All Access Network that renews at \$39.95 every 30 days in addition to membership in LifeTimeBonusPass.com for \$39.95 per month and Cyberotica for \$39.95 a month. During the offering of the “Free” membership, the website prints clear language that “FRAUD WILL BE PROSECUTED TO THE FULLEST EXTENT OF THE

LAW” and “Your IP Address xx.xxx.xx.xx is recorded for fraud prevention”. All allow the Defendant to benefit commercially from Plaintiff’s work without any benefit to Plaintiff.

67. Upon information and belief, the Internet user, initially lead to believe that Defendant’s website is a completely free viewing site, is presented with options that appear to enhance the viewing experience of unauthorized works owned by Plaintiff. The user is lead to believe he can download the films only through registration, which directly and financially benefits the Defendant. Defendants give away unauthorized viewing of Plaintiff’s property enticing users to purchase products with direct financial results to Defendant.

68. Upon information and belief, Defendant website BoneProne sells advertising around displays of Plaintiff’s unauthorized copyrighted works that compete with Plaintiff. The value of advertising space is directly related to the popularity of Plaintiff’s works and the sale of this advertising space directly and financially benefits Defendant, with no benefit to Plaintiff.

69. Upon information and belief, Plaintiff’s copyrighted works have been and continue to be infringed by Defendant and the Doe Defendants through the reproduction, distribution, and public display of Plaintiff’s films by and through the Internet Web site BoneProne for which Defendant owns the domain registrations and to which Defendant and the Doe Defendants, stakeholders of the site, provide essential equipment and support.

70. Upon information and belief, the high volume of Internet traffic generated at Defendant’s website is due to the option Internet users are presented in viewing the infringed content for free, rather than obtaining the viewing rights legally and knowingly paying for such rights.

71. On or about November 2011, an initial search of Defendant’s website revealed and documented over 126 separate instances of copyright infringement of Plaintiff’s copyrighted and trademarked intellectual property. As of the date of this Complaint, 126 instances of infringement, identified by name and registration number in the following paragraphs, were documented as being displayed and distributed on Boneprone.com. Each of these films were displayed and distributed by Defendant and the Doe Defendants, each individually and acting in

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concert with each other, without the consent of, or licensing by, Fraserside, the copyright owner and registrant of the motion picture.

72. Plaintiff marks each film with a copyright notice and trademark in order to inform the public of Plaintiff's ownership. Upon information and belief Defendant has altered Plaintiff's films in that these notices and marks have been removed. Defendants intentionally delete, blur or obscure Plaintiff's watermarks and logos from Plaintiff's videos displayed on Defendants' website, causing consumers to be confused as to the origin of the audio-video content. The manipulation of identifying marks is also evidence of knowledge and intent to infringe Plaintiff's intellectual property rights.

73. Upon information and belief, Defendant has actual knowledge and clear notice of this extensive infringement of Plaintiff's titles. The infringement is clear and obvious even to the most naïve observer. In fact, Plaintiff's films are displayed and distributed on BoneProne through Defendant and the Doe Defendants acting in concert. Plaintiff's and other major producers' trademarks are used to index infringing material along with obfuscation of watermarks and other identifiers which is evidence of knowledge and intent.

74. By virtue of the conduct alleged herein, Defendants knowingly promote, participate in, facilitate, assist, enable, materially contribute to, encourage, and induce copyright and trademark infringement, and thereby have infringed, secondarily infringed, and induced infringement by others, the copyrights and trademarks in Plaintiff's copyrighted work, including but not limited to those listing the paragraphs below.

75. Defendants' infringement of Fraserside's copyrights and trademarks is aimed at Plaintiff. The infringement is aimed at harming Plaintiff in its business. Defendants have knowledge that Plaintiff owns the rights to the videos displayed and was aware that by Defendants' infringing activities, Plaintiff would lose profits.

76. Upon information and belief, and based on the foregoing facts, the Defendants do not qualify for safe harbor protection under the Digital Millennium Copyright Act (DMCA), 17 U.S.C. § 512(c).

77. Plaintiffs have incurred attorneys' fees and other costs in this action.

78. All conditions precedent to the maintenance of this action have occurred, have been performed, or have otherwise been satisfied.

**CLAIMS FOR RELIEF
COUNT I
Copyright Infringement**

79. On or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work ANAL LOLITAS (ANAL LOLAS), Copyright Registration Number PA0001670894 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/videos/Gabriella%20Marceau>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

80. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work ANAL LOLITAS (ANAL LOLAS), Copyright Registration Number PA0001670894 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/video/19246/ass-loving-babes-fuck-a-stud>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

81. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work ANAL LOLITAS (ANAL LOLAS), Copyright Registration Number PA0001670894 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/video/20542/gabriella-sunny-love-a-big-cock>. This copyrighted

and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

82. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work CLEOPATRA, Copyright Registration Number PA0001676455 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/videos/princess%20rita>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

83. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work CLEOPATRA, Copyright Registration Number PA0001676455 also protected by Trademark Registration 1014957; specifically located at http://www.Boneprone.com/video/18554/princess-rita-takes-it-up-the-ass?only_google=1. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

84. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work FATAL ORCHID, Copyright Registration Number PA0001675598 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/videos/katja%20kassin/page-2>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

85. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work FATAL ORCHID, Copyright Registration Number PA0001675598 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/video/14025/businesswoman-katja-keane-almost-faints-over-fucking>. This copyrighted and trademark protected work was displayed without the consent of,

or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

86. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work GIRLS OF DESIRE, Copyright Registration Number PA0001670895 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/videos/Gorgeous%20blonde,%20fucked%20with%20lust%20on%20the%20armchair>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

87. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work GIRLS OF DESIRE, Copyright Registration Number PA0001670895 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/video/9510/gorgeous-blonde-fucked-with-lust-on-the-armchair>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

88. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work IBIZA SEX PARTY 5, Copyright Registration Number PA0001674244 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/videos/Suzie%20diamond>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

89. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work IBIZA SEX PARTY 5, Copyright Registration Number PA0001674244 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/video/12652/suzie-diamond-goes-ass-to-mouth>. This copyrighted

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and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

90. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work IBIZA SEX PARTY 5, Copyright Registration Number PA0001674244 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/video/10557/sexy-suzie-diamonds-fills-her-both-holes-hard-mode>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

91. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work PAINTBALL WARRIORS, Copyright Registration Number PA0001675815 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/videos/priv>a. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

92. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work PAINTBALL WARRIORS, Copyright Registration Number PA0001675815 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/video/10886/busty-asian-priv-fucked-by-the-lake>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

93. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work SPREAD MY LIPS, Copyright Registration Number PA0001670902 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/videos/blonde%20ellen%20saint>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

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94. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work SPREAD MY LIPS, Copyright Registration Number PA0001670902 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/video/14789/blonde-ellen-saint-nice-butt-fucked-pov>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

95. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work TROPICAL TWINS, Copyright Registration Number PA0001670893 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/videos/Lillian%20Tiger>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

96. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work TROPICAL TWINS, Copyright Registration Number PA0001670893 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/video/11602/liliane-tiger-works-her-way-through-the-porn-jungle>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

97. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work MATADOR, Copyright Registration Number PA0000984665 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/videos/cassandra-wild-s-anal-gangbang>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

98. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work MATADOR, Copyright Registration Number PA0000984665 also

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protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/video/18527/cassandra-wild-s-anal-gangbang>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

99. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work PRIVATE STORIES, Copyright Registration Number PA0000792716 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/videos/gorgeous-blonde-is-fixed-on-the-car>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

100. In or about November 2011, www.Boneprone.com displayed and offered for viewing Fraserside's copyrighted work PRIVATE STORIES, Copyright Registration Number PA0000792716 also protected by Trademark Registration 1014957; specifically located at <http://www.Boneprone.com/video/10434/gorgeous-blonde-is-fixed-on-the-car>. This copyrighted and trademark protected work was displayed without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

101. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work ANAL LOLITAS, protected by Copyright Registration PA0001670894 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/2965320/anal_lolitas/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 9/1/2008 and has been viewed 5295 times.

102. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work ANAL LOLITAS, protected by Copyright Registration PA0001670894 and Trademark Registration 1014975; specifically located at

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http://www.tubekings.com/tube/3016683/gabriella_marceau_threesome/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 3/22/2009 and has been viewed 392 times.

103. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work ANAL MERMAIDS, protected by Copyright Registration PA0001670905 and Trademark Registration 1014975; specifically located at

http://www.tubekings.com/tube/3017266/maya_gold_-_anal_mermaids/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 12/4/2008 and has been viewed 340 times.

104. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work ANAL MERMAIDS, protected by Copyright Registration PA0001670905 and Trademark Registration 1014975; specifically located at

http://www.tubekings.com/tube/2967419/maya_gold_anal_fuckfest/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 01/30/2009 and has been viewed 12,656 times.

105. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work BEAUTIES IN THE TROPIX , protected by Copyright Registration PA0001674265 and Trademark Registration 1014975; specifically located at

http://www.tubekings.com/tube/3100292/suzie_carina/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by,

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Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 6/4/2011 and has been viewed 4,089 times.

106. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work BILLIONAIRE, protected by Copyright Registration PA0001674263 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3007616/sahara_knite_billionaire/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 2/21/2009 and has been viewed 280 times.

107. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work BILLIONAIRE, protected by Copyright Registration PA0001674263 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3008841/sahara_knite_fucks_in_africa/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 2/21/2009 and has been viewed 417 times.

108. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work BILLIONAIRE, protected by Copyright Registration PA0001674263 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/2979718/simony_diamond/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 4/27/2009 and has been viewed 3846 times.

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109. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work CANNES, protected by Copyright and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3139353/cannes_-_scene_2/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 2/6/2010 and has been viewed 138 times.

110. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work CANNES, protected by Copyright and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3142944/priva_takes_two cocks_on_couch/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 2/10/2010 and has been viewed 286 times.

111. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work CANNES, protected by Copyright and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3142848/hot_asian_priva_double_stuffed/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 2/27/2009 and has been viewed 259 times.

112. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work CASTINGS NO 14, protected by Copyright Registration PA0000948427 and Trademark Registration 1014975; specifically located at

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http://www.tubekings.com/tube/3180897/private_castings_14_-_pierre_woodman_-_colette/

This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 3/26/2011 and has been viewed 1792 times.

113. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work CASTINGS NO 15, protected by Copyright Registration PA0000948473 and Trademark Registration 1014975; specifically located at

http://www.tubekings.com/tube/3180938/private_castings_pierre_woodman_anita/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 3/2/2011 and has been viewed 2484 times.

114. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work CASTINGS NO 17, protected by Copyright Registration PA0000776244 and Trademark Registration 1014975; specifically located at

http://www.tubekings.com/tube/3180893/private_castings_pierre_woodman_katalyn/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 2/24/2011 and has been viewed 1903 times.

115. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work CASTINGS NO 18, protected by Copyright Registration PA0000984580 and Trademark Registration 1014975; specifically located at

http://www.tubekings.com/tube/3180922/private_castings_18_-_pierre_woodman_-_natacha/

This copyrighted and trademark protected work was displayed on Defendants website without

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the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 6/21/2011 and has been viewed 2311 times.

116. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work CASTINGS NO 19, protected by Copyright Registration PA0000984591 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3180933/private_castings_19_-_pierre_woodman_-_magdalena/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 3/26/2011 and has been viewed 1781 times.

117. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work CASTINGS NO 22, protected by Copyright Registration PA0001001584 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3180905/private_castings_22_-_pierre_woodman_-_monica/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 4/3/2011 and has been viewed 1403 times.

118. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work DANGEROUS CURVES, protected by Copyright Registration PA0001675596 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3178830/young_n_hot_jane_darling_making_wine/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the

motion picture. According to Defendant website, this video was uploaded 5/15/2011 and has been viewed 2227 times.

119. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work DOUBLE CONFUSION, protected by Copyright Registration PA0000984593 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3170271/harmony_grant_blonde_private_latex_nurse/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 2/8/2010 and has been viewed 445 times.

120. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work FATAL ORCHID, protected by Copyright Registration PA0001675598 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3131890/fatal_orchid_foursome_scene/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 2/22/2010 and has been viewed 303 times.

121. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work GIRLS OF DESIRE, protected by Copyright Registration PA0001670895 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3100015/sophie_moon-girls_of_desire/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 9/2/2009 and has been viewed 8096 times.

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122. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work GIRLS OF DESIRE, protected by Copyright Registration PA0001670895 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/2970189/sophie_moone_fucks/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 7/20/2010 and has been viewed 4315 times.

123. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work GIRLS OF DESIRE, protected by Copyright Registration PA0001670895 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/2967424/hot_model_sophie_moone/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 2/3/2009 and has been viewed 5322 times.

124. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work GIRLS OF DESIRE, protected by Copyright Registration PA0001670895 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/2964655/rare_sophie_moone_fucks_guy/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 10/9/2008 and has been viewed 7383 times.

125. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work GUNS AND ROUGH SEX, protected by Copyright Registration PA0001670901 and Trademark Registration 1014975; specifically located at

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http://www.tubekings.com/tube/3152546/cony_ferrara_and_patricia_diamond_kitchen_banging/

This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 11/18/2009 and has been viewed 243 times.

126. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work GUNS AND ROUGH SEX, protected by Copyright Registration PA0001670901 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/2965632/patricia_diamond_kitchen_sex/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 8/1/2011 and has been viewed 8525 times.

127. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work GUNS AND ROUGH SEX, protected by Copyright Registration PA0001670901 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/2976525/brunette_michelle_wild_/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 4/11/2009 and has been viewed 3711 times.

128. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work MATADOR 3, protected by Copyright Registration PA0000990723 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3169398/kate_-_matador/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by,

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Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 3/23/2010 and has been viewed 119 times

129. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work MATADOR 4, protected by Copyright Registration PA0000990707 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3005284/matador_anal_gaping__1/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 12/27/2008 and has been viewed 266 times.

130. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work PORN OLYMPICS, protected by Copyright Registration PA0001670614 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3107067/britney_-_pornolympics_the_anal_games/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 1/15/2010 and has been viewed 5019 times.

131. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work PORN OLYMPICS, protected by Copyright Registration PA0001670614 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3182416/pornolympics___even_if_you_lose_you_win/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 4/16/2011 and has been viewed 958 times.

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132. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work PRIVATE GOLD 6 CAPE TOWN 2, protected by Copyright Registration PA0000926220 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3169397/gabriella_wolf_-_cape_town/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 7/9/2010 and has been viewed 309 times.

133. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work PRIVATE GOLD 6 CAPE TOWN 2, protected by Copyright Registration PA0000926220 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3147793/blondie_bee_and_demia_moore_dp_africa/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 12/23/2009 and has been viewed 432 times.

134. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work PSYCHOPORN, protected by Copyright Registration PA0001670904 and Trademark Registration 1014975; specifically located at <http://www.tubekings.com/tube/2967679/psychoporn/> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 1/20/2009 and has been viewed 1386 times.

135. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work SUPERFUCKERS, protected by Copyright Registration PA0000990734 and Trademark Registration 1014975; specifically located at

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http://www.tubekings.com/tube/3146865/anita_black_-_superfuckers/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 6/23/2010 and has been viewed 188 times.

136. In November 2011, Plaintiff documented [www.tubekings.com](http://www.tubekings.com/tube/2966968/anita_black/) display and offer for viewing Plaintiff's copyrighted work SUPERFUCKERS, protected by Copyright Registration PA0000990734 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/2966968/anita_black/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video has been viewed 4908 times.

137. In November 2011, Plaintiff documented [www.tubekings.com](http://www.tubekings.com/tube/3137349/twisted_dreams/) display and offer for viewing Plaintiff's copyrighted work TANYA HYDE'S TWISTED DREAMS, protected by Copyright Registration PA0000984581 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3137349/twisted_dreams/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 11/15/2009 and has been viewed 172 times.

138. In November 2011, Plaintiff documented [www.tubekings.com](http://www.tubekings.com/tube/3154293/nikki_ryder_-_a_taste_of_pleasure/) display and offer for viewing Plaintiff's copyrighted work TASTE OF PLEASURE, protected by Copyright Registration PA0001674267 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3154293/nikki_ryder_-_a_taste_of_pleasure/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

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According to Defendant website, this video was uploaded 2/10/2010 and has been viewed 176 times.

139. In November 2011, Plaintiff documented www.tubekings.com display and offer for viewing Plaintiff's copyrighted work TROPICAL TWINS, protected by Copyright Registration PA0001670893 and Trademark Registration 1014975; specifically located at http://www.tubekings.com/tube/3144794/jane_darlin_and_her_tropical_twins/ This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture. According to Defendant website, this video was uploaded 6/1/2010 and has been viewed 365 times.

140. Defendant's own website claims that Plaintiff's videos have been viewed over 94,540 times on the website Tubekings.com.

141. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work ANAL LOLITAS, protected by Copyright Registration PA0001670894 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/866705/hole-lolitas-scene-7-anal.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

142. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work ANAL LOLITAS, protected by Copyright Registration PA0001670894 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/866673/butt-lolas-scene-2-anal.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

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143. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work ANAL LOLITAS, protected by Copyright Registration PA0001670894 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/792208/gabriella-marceau-tree-people-fucking-threesome.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

144. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work ANAL LOLITAS, protected by Copyright Registration PA0001670894 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1204056/rectum-lolitas-anal.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

145. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work ANAL LOLITAS, protected by Copyright Registration PA0001670894 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1041049/ass-fucking-lolas-scene-3-anal.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

146. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work ANAL LOLITAS, protected by Copyright Registration PA0001670894 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1204463/euro-golden-kathy-anal-lolas-blonde.html> This copyrighted and trademark protected work was displayed on Defendants website without

the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

147. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work ANAL LOLITAS, protected by Copyright Registration PA0001670894 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1041056/hole-lolas-scene-4-anal.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

148. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work ANAL LOLITAS, protected by Copyright Registration PA0001670894 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1041136/ass-fucking-lolas-scene-2-anal.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

149. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work ANAL MERMAIDS, protected by Copyright Registration PA0001670905 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/95256/maya-gold-rectum-mermaids-anal.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

150. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work BEAUTIES IN THE TROPIX , protected by Copyright Registration PA0001674265 and Trademark Registration 1014975; specifically located at

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<http://www.socalmovies.com/tube-watch/594005/juicy-stunning-suzie-carina-receives-a-creamy-load-of-cock-sauce-on-her-warm-mouth-hot.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

151. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work BEAUTIES IN THE TROPIX , protected by Copyright Registration PA0001674265 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/594128/lovely-slim-honey-suzie-carina-slamming-her-young-sweet-pussy-on-a-stiff-cock-tight.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

152. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work BEAUTIES IN THE TROPIX , protected by Copyright Registration PA0001674265 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/594271/hot-adult-babe-suzie-carina-enjoys-blowing-a-meaty-stiff-cock-outdoor-porn.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

153. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work BEAUTIES IN THE TROPIX , protected by Copyright Registration PA0001674265 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/630070/suzie-carina-takes-her-fingers-into-her-rump-outdoor-ass.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

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154. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work BEAUTIES IN THE TROPIX , protected by Copyright Registration PA0001674265 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1144727/suzie-carina-beach-fucking-sex.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

155. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work BILLIONAIRE , protected by Copyright Registration PA0001674263 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/604954/busty-babe-simony-diamond-eagerly-takes-a-long-pecker-in-her-juicy-mouth-dick.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

156. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work BILLIONAIRE , protected by Copyright Registration PA0001674263 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/604673/lovable-simony-diamond-receives-a-rich-load-of-infected-spurt-on-her-mouth-cock.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

157. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work BILLIONAIRE , protected by Copyright Registration PA0001674263 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/78272/sahara-knife-billionaire.html> This copyrighted

and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

158. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work BILLIONAIRE , protected by Copyright Registration PA0001674263 and Trademark Registration 1014975; specifically located at

<http://www.socalmovies.com/tube-watch/1027608/billionaire-3-.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

159. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work BILLIONAIRE , protected by Copyright Registration PA0001674263 and Trademark Registration 1014975; specifically located at

<http://www.socalmovies.com/tube-watch/1058515/billionaire-.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

160. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work BILLIONAIRE , protected by Copyright Registration PA0001674263 and Trademark Registration 1014975; specifically located at

<http://www.socalmovies.com/tube-watch/1041519/billionaire-.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

161. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work CANNES, protected by Copyright and Trademark Registration 1014975; specifically located at [http://www.socalmovies.com/tube-](http://www.socalmovies.com/tube-watch/266085/cannes-scene-2.html)

[watch/266085/cannes-scene-2.html](http://www.socalmovies.com/tube-watch/266085/cannes-scene-2.html) This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

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162. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/410284/plo33-nikky-rider-dvd2-cd1.html) display and offer for viewing Plaintiff's copyrighted work CARIBBEAN DREAM , protected by Copyright Registration PA0001670898 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/410284/plo33-nikky-rider-dvd2-cd1.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

163. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/1119018/2-stunning-caribbean-girls-fucking-hard-hot.html) display and offer for viewing Plaintiff's copyrighted work CARIBBEAN DREAM , protected by Copyright Registration PA0001670898 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1119018/2-stunning-caribbean-girls-fucking-hard-hot.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

164. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/227139/private-castings-15-pierre-woodman-anita.html) display and offer for viewing Plaintiff's copyrighted work CASTINGS NO 15, protected by Copyright Registration PA0000948473 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/227139/private-castings-15-pierre-woodman-anita.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

165. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/1208576/private-castings-18-.html) display and offer for viewing Plaintiff's copyrighted work CASTINGS NO 18, protected by Copyright Registration PA0000984580 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1208576/private-castings-18-.html> This copyrighted

and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

166. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work CASTINGS NO 21, protected by Copyright Registration PA0000990711 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/227029/private-castings-21-pierre-woodman-victoria.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

167. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work CASTINGS NO 21, protected by Copyright Registration PA0000990711 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/827050/private-castings-21-pierre-woodman-victoria.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

168. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work CASTINGS NO 22, protected by Copyright Registration PA0001001584 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/227026/private-castings-22-pierre-woodman-monica.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

169. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work CASTINGS NO 22, protected by Copyright Registration PA0001010003 and Trademark Registration 1014975; specifically located at

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<http://www.socalmovies.com/tube-watch/227023/private-castings-23-pierre-woodman-yvette.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

170. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work CLEOPATRA, protected by Copyright Registration PA0001676455 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1035360/cleopatra-the-queen-of-egyptian-dick-cock.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

171. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work COMING OF AGE, protected by Copyright Registration PA0001674262 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1070976/deja-dare-coming-of-age-scene-1-.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

172. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work COMING OF AGE, protected by Copyright Registration PA0001674262 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/606629/judith-fox-blows-and-fucks-two-sexy-hard-cocks-in-the-open-air-hot.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

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173. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/273734/fatal-orchid-foursome-scene.html) display and offer for viewing Plaintiff's copyrighted work FATAL ORCHID protected by Copyright and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/273734/fatal-orchid-foursome-scene.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

174. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/1098648/katja-kean-fatal-orchid-2-scene-4-b-.html) display and offer for viewing Plaintiff's copyrighted work FATAL ORCHID 2 protected by Copyright Registration PA0001675598 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1098648/katja-kean-fatal-orchid-2-scene-4-b-.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

175. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/1087894/katja-kean-anal-intercourse-machine-fuck.html) display and offer for viewing Plaintiff's copyrighted work FATAL ORCHID 2 protected by Copyright Registration PA0001675598 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1087894/katja-kean-anal-intercourse-machine-fuck.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

176. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/1206927/katja-kean-adores-it-wild-likes.html) display and offer for viewing Plaintiff's copyrighted work FATAL ORCHID 2 protected by Copyright Registration PA0001675598 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1206927/katja-kean-adores-it-wild-likes.html> This copyrighted and trademark protected work was displayed on Defendants website without the

consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

177. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work FATAL ORCHID 2 protected by Copyright Registration PA0001675598 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1009927/bettina-foursome-.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

178. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work GIRLS OF DESIRE, protected by Copyright Registration PA0001670895 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1139760/young-sophie-moone-fucks-guy-teen.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

179. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work GIRLS OF DESIRE, protected by Copyright Registration PA0001670895 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tubelist/out.php?url=http://www.socalmovies.com/tube-watch/728969/sophie-moone.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

180. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work GIRLS OF DESIRE, protected by Copyright Registration PA0001670895 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/679042/young-sophie-moone-fucks-guy-teen.html>

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This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

181. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work GIRLS OF DESIRE, protected by Copyright Registration PA0001670895 and Trademark Registration 1014975; specifically located at

<http://www.socalmovies.com/tube-watch/768500/innocent-sophie-moone-fucks-guy-teen.html>

This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

182. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work GIRLS OF DESIRE, protected by Copyright Registration PA0001670895 and Trademark Registration 1014975; specifically located at

<http://www.socalmovies.com/tube-watch/1196467/rare-sophie-moone-fucks-male-guy.html> This

copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

183. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work GIRLS OF DESIRE, protected by Copyright Registration PA0001670895 and Trademark Registration 1014975; specifically located at

<http://www.socalmovies.com/tube-watch/1215099/sophie-moone-pounding-sex.html> This

copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

184. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work GIRLS OF DESIRE, protected by Copyright Registration

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PA0001670895 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/747375/sophie-moone-is-one-sexy-hardcore-hostess-hot.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

185. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/623829/attractive-girl-sophie-moone-nailed-hard-and-facialised-hot.html) display and offer for viewing Plaintiff's copyrighted work GIRLS OF DESIRE, protected by Copyright Registration PA0001670895 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/623829/attractive-girl-sophie-moone-nailed-hard-and-facialised-hot.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

186. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/623958/hot-blonde-chick-sophie-moone-gets-vagina-licked-and-blows-big-hard-shaft-pussy.html) display and offer for viewing Plaintiff's copyrighted work GIRLS OF DESIRE, protected by Copyright Registration PA0001670895 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/623958/hot-blonde-chick-sophie-moone-gets-vagina-licked-and-blows-big-hard-shaft-pussy.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

187. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/213489/rita-faltoyano-in-pg61c-full.html) display and offer for viewing Plaintiff's copyrighted work GLADIATOR, protected by Copyright Registration PA0001674249 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/213489/rita-faltoyano-in-pg61c-full.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

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188. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/217343/ladyoftherings-1-part-2.html) display and offer for viewing Plaintiff's copyrighted work LADY OF THE RINGS, protected by Copyright Registration PA0001673381 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/217343/ladyoftherings-1-part-2.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

189. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/217355/lady-of-the-rings-1part-1.html) display and offer for viewing Plaintiff's copyrighted work LADY OF THE RINGS, protected by Copyright Registration PA0001673381 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/217355/lady-of-the-rings-1part-1.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

190. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/1103022/the-matador-series-.html) display and offer for viewing Plaintiff's copyrighted work MATADOR, protected by Copyright Registration PA0000984665 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1103022/the-matador-series-.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

191. In October 2011, Plaintiff documented [www.socalmovies.com](http://www.socalmovies.com/tube-watch/1047111/krystal-deboor-tree-people-fucking-dp-matador-2-threesome.html) display and offer for viewing Plaintiff's copyrighted work MATADOR 2, protected by Copyright Registration PA0000984575 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1047111/krystal-deboor-tree-people-fucking-dp-matador-2-threesome.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

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192. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work MATADOR 3, protected by Copyright Registration PA0000990723 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/830359/matador-3-good-hole-anal.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

193. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work MATADOR 3, protected by Copyright Registration PA0000990723 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/213479/matador-3-two-anal-double.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

194. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work MATADOR 3, protected by Copyright Registration PA0000990723 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/320291/kate-matador.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

195. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work MATADOR 4, protected by Copyright Registration PA0000990707 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/75940/matador-butt-gaping-1-anal.html> This copyrighted and trademark protected work was displayed on Defendants website without the

consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

196. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work MATADOR 5 SEX TRIP, protected by Copyright Registration PA0001003434 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1205987/hana-melonova-aka-lucy-van-damamp-venus-private-the-matador-.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

197. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work PAINTBALL WARRIORS, protected by Copyright Registration PA0001675815 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/1127223/suzie-diamond-paintball-warriors-.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

198. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work PORN OLYMPICS, protected by Copyright Registration PA0001670614 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/881718/pornolympics-even-if-you-lose-you-win.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

199. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work PRIVATE GOLD 5 CAPE TOWN, protected by Copyright Registration PA0000926228 and Trademark Registration 1014975; specifically located at

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<http://www.socalmovies.com/tube-watch/219458/cape-town-scene-1.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

200. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work PRIVATE GOLD 5 CAPE TOWN, protected by Copyright Registration PA0000926228 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/219297/cape-town-scene-4.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

201. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work PRIVATE GOLD 5 CAPE TOWN, protected by Copyright Registration PA0000926228 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/219135/cape-town-scene-5.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

202. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work PRIVATE GOLD 5 CAPE TOWN, protected by Copyright Registration PA0000926228 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/219413/cape-town-scene-2.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

203. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work PRIVATE GOLD 5 CAPE TOWN, protected by Copyright Registration PA0000926228 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/219405/cape-town-scene-3.html> This copyrighted and

trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

204. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work PRIVATE GOLD 5 CAPE TOWN, protected by Copyright Registration PA0000926220 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/320312/gabriella-wolf-cape-town.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

205. In October 2011, Plaintiff documented www.socalmovies.com display and offer for viewing Plaintiff's copyrighted work TASTE OF PLEASURE, protected by Copyright Registration PA0001674267 and Trademark Registration 1014975; specifically located at <http://www.socalmovies.com/tube-watch/251013/nikki-ryder-a-taste-of-pleasure.html> This copyrighted and trademark protected work was displayed on Defendants website without the consent of, or licensing by, Fraserside IP LLC, the copyright owner and trademark owner of the motion picture.

206. The foregoing constitutes reproduction, distribution, public performance, public display and/or preparation of derivatives of Plaintiff's copyrighted works by Defendant.

207. Defendant's reproduction, distribution, public performance, public display and/or preparation of derivatives of Plaintiff's copyrighted works, as alleged herein, have been done without Plaintiff's permission.

208. Defendant's reproduction, distribution, public performance, public display and/or preparation of derivatives of Plaintiff's copyrighted works, as alleged herein, have not been done for purposes of criticism, comment, news reporting, teaching (including multiple copies for classroom use), scholarship, or research.

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209. Defendant's reproduction, distribution, public performance, public display and/or preparation of derivatives of Plaintiff's copyrighted works, as alleged herein, constitute a violation of Plaintiff's exclusive rights, as set forth in 17 U.S.C. § 106.

210. Defendant's conduct was willful within the meaning of 17 U.S.C. § 101, et seq. At a minimum, Defendant acted with willful blindness and reckless disregard of Plaintiff Plaintiff's registered copyrights

211. Because of their wrongful conduct, Defendant is liable to Plaintiff for copyright infringement. See 17 U.S.C. § 501. Plaintiff suffers and will continue to suffer substantial losses, including, but not limited to, damage to its business reputation and goodwill.

212. The law permits Plaintiff to recover damages, including readily ascertainable direct losses and all profits Defendant made by its wrongful conduct. Id. § 504. Alternatively, the law permits Plaintiff to recover statutory damages. Id. § 504(c).

213. Because of Defendant's willful infringement, the law permits enhancement of the allowable statutory damages. Id. § 504(c)(2).

214. The law permits Plaintiff injunctive relief. Id. § 502. Further, the law permits a Court Order impounding any and all infringing materials and instrumentalities. Id. § 503.

215. Plaintiff has no adequate remedy at law for Defendants' wrongful conduct, as follows:

a. Plaintiff's copyrights are unique and valuable property having no readily determinable market value;

b. Defendant's infringement harms Plaintiff's business reputation and goodwill such that Plaintiff could not be made whole by any monetary award; and

c. Defendants' wrongful conduct and damages to Plaintiff are continuing and unremitting.

216. Plaintiff is entitled to preliminary and permanent injunctive relief prohibiting further infringement of Plaintiff's copyrights. 17 U.S.C. § 502.

Count II

Contributory Copyright Infringement

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217. Plaintiff repeats, re-alleges, and incorporates by reference each and every preceding allegation set forth herein.

218. On information and belief, Defendants have engaged in the business of knowingly inducing, causing, and/or materially contributing to unauthorized reproduction, adaptation, public display and/or distribution of copies of the Plaintiff's copyrighted works, and thus to the direct infringement of Plaintiff's copyrighted works.

219. On information and belief, Defendants' actions constitute contributory infringement of Plaintiff's copyrights and exclusive rights under copyright in the Plaintiff's copyrighted works in violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

220. Defendant's unauthorized publication of Plaintiff's copyrighted works constitutes infringement of Plaintiff's rights in and to each of the copyrighted works and each publication constitutes a separate and distinct infringement.

221. By enabling, causing, facilitating, materially contributing to, and encouraging the unauthorized publication and reproduction, distribution, and public display of unauthorized copying of Plaintiff's copyrighted works in the manner described above, with full knowledge of the illegality of such conduct, Defendant has contributed to and induced a vast number of copyright and trademark infringements against Plaintiff.

222. The unauthorized reproduction, distribution, and public display of Plaintiff's copyrighted works that Defendant enables, causes, materially contributes to and encourages through the acts described above are without Plaintiff's consent and are not otherwise permissible under the Copyright Act.

223. The acts of infringement by Defendants have been willful, intentional, purposeful and in reckless disregard of and with indifference to Plaintiff's rights.

224. As a direct and proximate result of the infringements by Defendants of Plaintiff's copyrights and exclusive rights under copyright in the Plaintiff's copyrighted works, Plaintiff is entitled to its actual damages and Defendants' profits pursuant to 17 U.S.C. § 504(b).

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225. Alternatively, Plaintiff is entitled to maximum statutory damages, pursuant to 17 U.S.C. § 504(c), in the amount of \$150,000 with respect to each work infringed, or such other amounts as may be proper under 17 U.S.C. § 504(c).

226. Plaintiff is further entitled to their attorneys' fees and full costs pursuant to 17 U.S.C. § 505.

COUNT III

Vicarious Copyright Infringement

227. Plaintiff repeats, re-alleges, and incorporates by reference each and every preceding allegation set forth herein.

228. On information and belief, Defendants have engaged in the business of profiting through advertising around Plaintiff's copyrighted works on its website, thus knowingly and vicariously causing and benefiting from the unauthorized reproduction, adaptation, public display and/or distribution of copies of the Plaintiff's copyrighted works, and thus to the vicarious infringement of Plaintiff's copyrighted works.

229. On information and belief, Defendants' actions constitute vicarious infringement of Plaintiff's copyrights and exclusive rights under copyright in the Plaintiff's copyrighted works in violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

230. The infringement of Plaintiff's rights in and to each of the Plaintiff's copyrighted works constituted a separate and distinct infringement.

231. The acts of infringement by Defendants have been willful, intentional, purposeful and in reckless disregard of and with indifference to Plaintiff's rights. As a direct and proximate result of the infringements by Defendants of Plaintiff's copyrights and exclusive rights under copyright in the Plaintiff's copyrighted works, Plaintiff is entitled to its actual damages and Defendants' profits pursuant to 17 U.S.C. § 504(b).

232. Alternatively, Plaintiff is entitled to maximum statutory damages, pursuant to 17 U.S.C. § 504(c), in the amount of \$150,000 with respect to each work infringed, or such other amounts as may be proper under 17 U.S.C. § 504(c).

233. Plaintiff is further entitled to their attorneys' fees and full costs pursuant to 17 U.S.C. § 505.

COUNT IV

Inducement of Copyright Infringement

234. Plaintiff repeats, re-alleges, and incorporates by reference each and every preceding allegation set forth herein.

235. On information and belief, Defendants have encouraged the illegal uploading and downloading of Plaintiff's copyrighted works by compensating uploaders, thus inducing the unauthorized reproduction, adaptation, public display and/or distribution of copies of the Plaintiff's copyrighted works, and thus to the direct infringement of Plaintiff's copyrighted works.

236. Upon information and belief, Defendant's pay third parties to send traffic to Defendant's website, knowing the website gains monetary benefit from unauthorized copyrighted works, thus inducing copyright infringement and illegally benefiting Defendant and third parties from such infringement.

237. On information and belief, Defendants' actions constitute inducing copyright infringement of Plaintiff's copyrights and exclusive rights under copyright in the Plaintiff's copyrighted works in violation of the Copyright Act, 17 U.S.C. §§ 106 and 501.

238. The infringement of Plaintiff's rights in and to each of the Plaintiff's copyrighted works constituted a separate and distinct infringement.

239. The acts of infringement by Defendants have been willful, intentional, purposeful and in reckless disregard of and with indifference to Plaintiff's rights.

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240. As a direct and proximate result of the infringements by Defendants of Plaintiff's copyrights and exclusive rights under copyright in the Plaintiff's copyrighted works, Plaintiff is entitled to its actual damages and Defendants' profits pursuant to 17 U.S.C. § 504(b).

241. Alternatively, Plaintiff is entitled to maximum statutory damages, pursuant to 17 U.S.C. § 504(c), in the amount of \$150,000 with respect to each work infringed, or such other amounts as may be proper under 17 U.S.C. § 504(c).

242. Plaintiff is further entitled to their attorneys' fees and full costs pursuant to 17 U.S.C. § 505.

COUNT V

False Designation of Origin under the Lanham Act

243. Plaintiff repeats, re-alleges, and incorporates by reference each and every preceding allegation set forth herein.

244. Upon information and belief, Defendant's conduct is likely to cause confusion, mistake or deception as to Defendants' affiliations, connection, or association with Plaintiff, or as to the origin, sponsorship or approval of their goods or commercial activities.

245. Defendants' conduct as alleged herein, including but not necessarily limited to their use of Plaintiff's marks, constitutes false designation of origin pursuant to 15 U.S.C. § 1125(a).

246. Plaintiff has been damaged by these acts in an amount to be proven at trial. Plaintiff is also entitled under the Lanham Act to injunctive and equitable relief against Defendants.

PRAYER FOR RELIEF

A. That Defendants, their agents, servants, officers, directors, employees, attorneys, privies, representatives, successors and assigns and parent and subsidiary corporations or other related entities, and any or all persons in act of concert or participation with any of them, be preliminarily and permanently enjoined from:

(1) Any further use of Plaintiff trade dress and terms which is confusingly similar thereto;

- (2) Directly or indirectly using Plaintiff trade dress and terms or confusingly similar trade dress and terms, either alone or in combination with other terms, marks, symbols or trade dress;
- (3) Any further use of Plaintiff trade dress or terms, or any element thereof, in connection with the marketing or sale of adult entertainment;
- (4) Performing any action or using any trade dress, terms, or other name, mark, symbol, imagery or slogan which is likely to cause confusion or mistake, or to deceive or otherwise mislead the trade and/or public into believing that Plaintiff and Defendants are one and the same, or in some way connected, or that Plaintiff is the sponsor of Defendants or their products, or the Defendants in some manner are affiliated or associated with, or under the supervision of Plaintiff, or that Defendants' products originate with Plaintiff, or are connected or offered with the approval, consent, authorization, or under the supervision of Plaintiff;
- (5) Marketing or selling any product containing or utilizing Plaintiff' intellectual property or business values; or
- (6) Any other conduct constituting unfair competition with Plaintiff, misappropriation of Plaintiff trade dress or terms or business values.

B. That Defendants be ordered to transfer the domain www.Boneprone.com, and all similar domains held by Defendant found in discovery, such as misspellings of the enumerated domains, domains held by Defendant linked to [Boneprone.com](http://www.Boneprone.com), and the content therein to Plaintiff.

C. That Defendants be ordered to transfer the domain www.Tubekings.com, and all similar domains held by Defendant found in discovery, such as misspellings of the enumerated domains, domains held by Defendant linked to [Tubekings.com](http://www.Tubekings.com), and the content therein to Plaintiff.

D.. That Defendants be ordered to transfer the domain www.SoCalMovies.com, and all similar domains held by Defendant found in discovery, such as misspellings of the enumerated domains, domains held by Defendant linked to [SoCalMovies.com](http://www.SoCalMovies.com), and the content therein to Plaintiff.

- E. That Defendants be ordered to file with the Court and serve upon Plaintiff, within thirty (30) days after the entry of an injunction, a report in writing and under oath, setting forth in detail the manner and form in which Defendants have complied with any ordered injunction;
- F. That Plaintiff be awarded damages in an amount to be determined at trial all infringing activities, including Plaintiff damages and lost profits, Defendants' profits, plus any costs incurred in preventing future confusion, mistake or deception, all from the date of first infringement;
- G. That Defendants pay Plaintiff a sum sufficient to cover the cost of corrective advertising necessary to alleviate any existing or lingering confusion resulting from Defendants' unauthorized use of Plaintiff trade dress and terms;
- H. That Defendants be ordered to account to Plaintiff for all profits, gains and advantages which they have realized as a consequence of their unauthorized use of Plaintiff trade dress and terms, as well as any confusingly similar trade dress or terms;
- I. That Plaintiff be awarded enhanced damages and attorney's fees;
- J. That Plaintiff be awarded pre-judgment and post-judgment interest;
- K. That Plaintiff be awarded costs and expenses incurred in prosecuting this action, including expert witness fees; and
- L. That such other and further preliminary and permanent relief be awarded to Plaintiff as the Court deems just and fair.

JURY DEMAND

Plaintiff FraserSide IP LLC demands a jury on all issues.

DATED: April 19, 2012

Respectfully submitted,

By:

/Lake James H. Perriguet/
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